

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

V.

CHARLES BEN BOUNDS, ET AL.

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§
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Cause No. 4:16-CR-132-A

DEFENDANT MEGAN KEMP'S UNOPPOSED MOTION TO ENLARGE
TIME TO FILE MOTION FOR DOWNWARD DEPARTURE

TO THE HONORABLE JOHN MCBRYDE, UNITED STATES DISTRICT COURT
JUDGE:

Now comes Defendant, Megan Kemp ("Ms. Kemp"), by and through her attorney of record, A. Clay Graham, and files this Motion to Enlarge Time to File Motion for Downward Departure, and in support would respectfully show unto this Court as follows:

1) Pursuant to this Court's Sentencing Scheduling Order, any written motion for downward departure was to be filed on or before January 17, 2017.

2) due to communications with the Assistant U.S. Attorney, consultations with the Defendant and prospectively beneficial information to be disclosed in the

forthcoming Addendum to the PSR, undersigned counsel required additional time in which to complete the Motion for Downward Departure to be filed on Ms. Kemp's behalf.

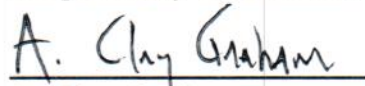
3) Undersigned counsel reasonably believes he will be able to investigate, draft, and file the Motion for Downward Departure within three days of being provided with the Addendum to the PSR, which upon information and belief, will be forthcoming in the very near future.

4) Defendant's Motion for Downward Departure is to be filed under seal in a manner compliant with this Court's directive on filing materials under seal.

4) Counsel for the United States is not opposed to the relief sought in this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this Court grant the relief sought in this motion, and enlarge the time in which to file his Motion for Downward Departure, to be filed within three days of undersigned counsel's receipt of the Addendum to the PSR.

Respectfully submitted,



A. Clay Graham

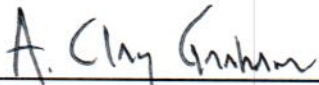
TBN: 24064140

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Megan Kemp

CERTIFICATE OF CONFERENCE

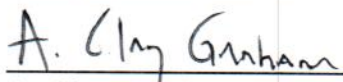
I hereby certify that a conference regarding the foregoing pleading was held with counsel for the United States, Shawn Smith, and said counsel is not opposed to the relief requested in this Motion.



A. Clay Graham

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was provided to counsel for the government by a manner compliant with the rules on January 25, 2017.



A. Clay Graham